

DOCKETED

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Proposed changes to revised requirement to avoid gap in OSHA NRTL program

Due to previous experience, UL is recommending minor modification in the guidelines to avoid a situation where certification bodies do not have UL 61730 in their NRTL scope of accreditation. The document attached to this submission indicates areas of the document to be revised and the recommended revisions.

Additional submitted attachment is included below.

Updates to Guidelines for California's Solar Electric Incentive Programs (Senate Bill 1)

Thursday, November 1, 2018,

Proposal for Upload

CALIFORNIA ENERGY COMMISSION, 1516 Ninth Street

Sacramento, California 95814-5512

Proposed changes in **BLUE**.

Ref doc: TN224968_20181012T114501_Draft_Guidelines_for_California's_Solar_Electric_Incentive_Prog.pdf

Page 10, Section A, first bullet.

Current language:

- PV modules shall have a product certification indicating compliance with an American National Standard for safety ~~UL 1703~~ from a Nationally Recognized Testing Laboratory ²⁵ (NRTL). Certification to UL 61730 (Parts 1 and 2) will be accepted as proof of compliance as of the effective date of these guidelines. Alternatively, certification to UL 1703 will be accepted until January 1, 2020.

#1 - Proposed Change:

PV modules shall have a product certification indicating compliance with UL 61730 from a Nationally Recognized Testing Laboratory (NRTL) by January 1, 2020. The product certification must be from a NRTL with either UL 1703 or UL 61730 in its scope of NRTL Recognition as posted on the OSHA web site from January 1, 2020 through December 31, 2021. Thereafter, UL 61730 in the NRTL scope of recognition is required.

Page B-1, Section A, first paragraph and footnote.

Current language:

- All flat-plate PV modules shall have certification conducted by an NRTL ⁷⁵ to an American National Standard for safety. UL 61730 certification from a NRTL shall be accepted as proof of compliance to applicable requirements as of the effective date of these guidelines. UL 1703 certification from a NRTL may be used for equipment listing requests submitted through December 31, 2019.

#2 - Proposed Change:

PV modules shall have a product certification indicating compliance with UL 61730 from a Nationally Recognized Testing Laboratory recognized by the US Occupational Safety and Health Administration (NRTL) by January 1, 2020. The product certification must be from a NRTL with either UL 1703 or UL 61730 in its scope of NRTL Recognition as posted on the OSHA web site from January 1, 2020 through December 31, 2021. Thereafter, UL 61730 in the NRTL scope of recognition is required.

Current language:

- ⁷⁵ Nationally Recognized Testing Laboratories must be approved to conduct test UL 61730 or UL 1703 (as applicable) under the scope of their OSHA recognition. Not all Nationally Recognized Testing Laboratories recognized by OSHA are approved to test for UL 61730 or UL 1703.

#3 - Proposed Change:

Nationally Recognized Testing Laboratories recognized by the US Occupational Safety and Health Administration must be approved with UL 61730 and/or UL 1703 in their scope of NRTL recognition as posted on the OSHA web site from January 1, 2020 through December 31, 2021. Thereafter, UL 61730 in the NRTL scope of recognition is required.